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October 11, 2015

Power Plant and Transmission Line Siting Committee
Arizona Corporation
1200 W. Washington Street
Phoenix, AZ 85007

Arizona Corporation Commission

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Dear Committee Members:

I first heard about the SouthWest Power Group (SWPG) in the summer of 2007, and I and spoke to the Cochise County Board of Supervisors against their proposed Bowie Power Plant. SunZia was already part of the picture -- it was said to be coming along "just in time" to transport the energy produced by the Bowie Plant -- as if it were a gift from afar -- a rare but welcome coincidence. I met Tom Wray, the major proponent of Bowie, although he was listed merely as "The Electrical Interconnection Manager." My first notes about him concerned his proposal to obtain "clean coal" (involving carbon capture and sequestration) by passing CO2-laden exhaust from the Bowie plant over tomato plants or evergreen seedlings to improve their growth. (Note: this is extraordinarily far from what most people understand to be clean coal.) He also mentioned looking for a \$133 million tax credit (for producing "clean coal"). However, the Bowie Power Plant was not viewed as a specific threat to local environmental or community values, particularly since Bowie is east of Cascabel. -- except in the sense that coal plants are generally bad, polluting entities, causing asthma and other health problems in the population. The Bowie clean coal idea was rejected by the supervisors, and SWPG requested the reissue of a permit to use natural gas which was approved. We heard that their permit to produce electricity with natural gas was restored, and then that it was renewed.

Our community started hearing about SunZia as an independent entity that would affect our Valley in 2009. We have been working against it since then. SWPG, along with the Environmental Planning Group, LLC, has apparently convinced a large segment of the government that its plans for SunZia have nothing to do with the fact that SWPG also owns Bowie, despite the fact that all the routes pass by the proposed Bowie site. They talk at length about wind from New Mexico, although no wind power seems to be developing there even now, years later. They have gone to great pains to maintain the notion that their project's goal is to support clean power, even going so far as agreeing to bury the power

lines North of White Sands Missile Range, which if they actually do so will require a great deal of money and which will be a technological first given the amount of power to be transmitted. Why do I think there is a fairly good chance they will elect not to build those lines into New Mexico?

Of course, if they don't build the lines into New Mexico, then they would only have the Arizona section. It could go from Bowie to the electrical distribution hub in Casa Grande. At the moment there are no renewable energy sources for it to carry, so, if they are lucky, power will be produced by the Bowie plant 'just in time.' We all know that transmission lines are obligated to carry power from any source on a first-come-first-served basis, and we all know they'd prefer to use power from a renewable source. But fortunate anyway!

All of this would be somewhat wryly entertaining were it not for the fact that this project will do real damage to the environment. The San Pedro Valley has been called one of the Last Great Places. The Upper San Pedro is protected by being a National Riparian Area. What a pity that no such protection exists for the Middle and Lower San Pedro! This transmission line will initiate the destruction of the Valley. Along with its support roads, it will cause fragmentation, and fragmentation leads to the disappearance of wildlife. All the new support roads and damage to the surface will change the hydrology, so what will happen to the flow of the river itself is anybody's guess. There are no other viable rivers flowing North-South; they have largely been drained by agriculture and development. Indeed the San Pedro is well on its way to being drained dry. But when it is gone, so will be the last major avian corridor leading to the entire Western half of the United States and Canada. It will be a silent spring.

There is enough solar and wind power in Arizona to meet Arizona's needs. California is independent of other states and intends to remain so, and it would cost Arizona taxpayers money to take the power delivered to Casa Grande to the California state line. There is enough solar and wind power in New Mexico to meet New Mexico's needs. I believe we have no need of fossil fuel power plants. Southline, if built, will provide much more connectivity than SunZia ever envisions.

No sacrifice of environmental values should be allowed because none is needed to move toward renewable, local energy.

Sincerely yours,



Elna L. Otter